Message

From: Lauren Heine [lheine@northwestgreenchemistry.org]
Sent: 9/10/2018 9:45:16 PM
To: Doug Krapas [dougkrapas@iepco.com]; Mullin, Michelle [Mullin.Michelle@epa.gov]
CC: Charlotte Trebilcock [ctrebilcock@northwestgreenchemistry.org]
Subject: Fwd: HP comments on WA State procurement criteria relative to PCBs in product packaging
Attachments: PCB-PolicyDraft-CW comments (003).docx

fyi below
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Begin forwarded message:

From: "Brewer, Kathy McKinney (Sustainability and Compliance)" <kathy.brewer@hp.com>
Subject: HP comments on WA State procurement criteria relative to PCBs in product packaging
Date: September 10, 2018 at 1:53:17 PM PDT
To: "Zarker, Ken (ECY)" <kzar461@ECY.WA.GOV>
Cc: "lheine@northwestgreenchemistry.org" <lheine@northwestgreenchemistry.org>, "Gallivan, Susanne" <susanne.gallivan@hp.com>, "Wray, Curtis" <curtis.wray@hp.com>

Hi Ken,

I met with Lauren Heine and Doug Krapas earlier in the summer, and they explained the PCB discharge situation that Inland Empire Paper is facing due to their processing of printed paper for recycling. I understand that the Spokane River Toxics Task Force was the driver behind the draft Washington procurement policy that would provide a preference for products in packaging that can be demonstrated to not contain PCBs. Attached are some comments we had on the policy when it was highlighted to us by our sales teams. I don't think we connected with anybody at Ecology, though, which is why I was interested in reaching out to you.

While we do see procurement policies as a very effective way to drive materials changes, they have to be written in a way that they are actionable and fair. Here are the issues we saw with the policy as written:

- No de minimis limit was specified. Non-detect is notoriously hard for PCBs as they can be detected at extremely low levels and performance between labs can vary. When we specify requirements to our suppliers, we always include a limit (even if what we really want is "none") so that we get consistency in assessment and suppliers can set up an actionable evaluation protocol.

- Analysis for PCBs is complex and expensive. When we were looking at starting our own testing for our inks and toners, the quote we got for Method 1668A, full congener list was $670 per sample. When we asked for a quote narrowed to the congeners that seemed to be of most concern as inadvertent PCBs (PCB-11, PCB-206, PCB-208, and PCB-209), the cost only went down to $500. The policy should clarify exactly what test protocol should be use so that any data submitted are comparable.

- Finally, it is not clear how a representative sample of packaging should be processed. It is known that potential for PCB contamination varies widely between colors, so without a clear sampling protocol specified, it would be easy to game the results by only testing parts of packaging that do not contain high risk colors.

Typically when we are faced with these types of complex characterization issues, we default to materials declarations vs. testing the final article. So in the case of packaging, we would be asking our packaging supplier to certify to us that they have confirmed any PCB contamination in packaging inks. Depending on our relationship with the supplier, we may also require test data. So you may want to consider as a first step including in the policy whether the product supplier has a program to assess/confirm the potential for PCB contamination in their packaging materials.

At HP we have been tracking this issue for several years and have reviewed in detail all of the reports that Ecology has published. However, in the absence of a targeted limit, it has been hard for us to determine what is actionable for our suppliers. Since we are starting to see questions around PCB content from some customers, however (largely due to the work Ecology has done), we decided we needed to lower the PCB contamination limit in our General Specification for the Environment this year.

HP is now selling large printing presses that are being used for package printing, and because we are expecting questions on this topic from the packaging customers, we will be doing more work with our ink/colorant suppliers to understand how much characterization has been done and confirming that they are meeting our new lower limit of 0.1 ppm. It will take a while to roll out the supplier communications and get responses, so it may be next spring before we have a good feel for our supply chain.

In the meantime I would be interested in understanding status and next steps on the procurement policy so my team can be prepared to support state bids that include HP products.

Kathy Brewer
Sustainability and Product Compliance

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-----Original Message-----
From: Zarker, Ken (ECY) <kzar461@ECY.WA.GOV>

Sent: Wednesday, August 29, 2018 6:35 AM
To: Brewer, Kathy McKinney (Sustainability and Compliance) <kathy.brewer@hp.com>
Subject: PCBs GSE

Hi Kathy -

Thanks for the leadership on inadvertent PCBs limits in Products.

Let touch base after Labor Day to discuss how to collaborate on this important issue.

Thanks,
Ken

Sent from my iPhone